

# **EXHIBIT “1”**

**Todd M. Arnold**

---

**From:** Todd M. Arnold  
**Sent:** Wednesday, August 14, 2019 11:02 AM  
**To:** 'garrett.fail@weil.com'; 'jacqueline.marcus@weil.com'  
**Cc:** 'sunny.singh@weil.com'  
**Subject:** RE: Sears et al. - Administrative Claim Of, And Future Dealings With, Weihai Lianqiao International Co., Ltd.  
**Attachments:** 4706 - WLI\_\_\_\_\_ Motion for the Allowance and Payment of Administrative Claim v.2.pdf; 4708 - WLI\_\_\_\_\_ Objection to Plan Confirmation v.2.pdf

Dear Counsel:

I see that the PC hearing was continued. In the interim, is there any interest in resolving my client's objection to PC and Admn. Claim?

If so, let's talk.

Thanks,  
Todd

---

**From:** Todd M. Arnold  
**Sent:** Monday, February 25, 2019 10:23 AM  
**To:** 'garrett.fail@weil.com' <garrett.fail@weil.com>; 'jacqueline.marcus@weil.com' <jacqueline.marcus@weil.com>  
**Cc:** 'sunny.singh@weil.com' <sunny.singh@weil.com>  
**Subject:** RE: Sears et al. - Administrative Claim Of, And Future Dealings With, Weihai Lianqiao International Co., Ltd.

Dear Counsel:

Pursuant to the claims bar date order [Dkt. 2676] can we reach agreement on the allowance of the 503(b)(9) claims set forth in the attached letter, which is substantially less than the proofs of claim previously filed by our client before our retention?

Please advise.

Thanks,  
Todd

---

**From:** Todd M. Arnold  
**Sent:** Wednesday, February 13, 2019 4:46 PM  
**To:** 'garrett.fail@weil.com' <[garrett.fail@weil.com](mailto:garrett.fail@weil.com)>; 'jacqueline.marcus@weil.com' <[jacqueline.marcus@weil.com](mailto:jacqueline.marcus@weil.com)>  
**Cc:** 'sunny.singh@weil.com' <[sunny.singh@weil.com](mailto:sunny.singh@weil.com)>  
**Subject:** RE: Sears et al. - Administrative Claim Of, And Future Dealings With, Weihai Lianqiao International Co., Ltd.

Dear Counsel:

Please advise on the email below.

Also, please let me know if, as a result of the sale, the Debtors are now estimated to be administratively solvent.

Thanks,  
Todd

---

**From:** Todd M. Arnold  
**Sent:** Monday, February 4, 2019 1:05 PM  
**To:** 'garrett.fail@weil.com' <[garrett.fail@weil.com](mailto:garrett.fail@weil.com)>; 'jacqueline.marcus@weil.com' <[jacqueline.marcus@weil.com](mailto:jacqueline.marcus@weil.com)>  
**Cc:** 'sunny.singh@weil.com' <[sunny.singh@weil.com](mailto:sunny.singh@weil.com)>  
**Subject:** FW: Sears et al. - Administrative Claim Of, And Future Dealings With, Weihai Lianqiao International Co., Ltd.

Dear Counsel:

I am resending this email because it was bounced back from Mr. Singh's email.

Regards,  
Todd

---

**From:** Todd M. Arnold <[TMA@lnbyb.com](mailto:TMA@lnbyb.com)>  
**Sent:** Monday, February 4, 2019 1:03 PM  
**To:** 'garrett.fail@weil.com' <[garrett.fail@weil.com](mailto:garrett.fail@weil.com)>; 'jacqueline.marcus@weil.com' <[jacqueline.marcus@weil.com](mailto:jacqueline.marcus@weil.com)>; 'sunny.singh@weil.com'  
**Cc:** Todd M. Arnold <[TMA@lnbyb.com](mailto:TMA@lnbyb.com)>  
**Subject:** FW: Sears et al. - Administrative Claim Of, And Future Dealings With, Weihai Lianqiao International Co., Ltd.

Dear Counsel:

Our firm is counsel to Weihai Lianqiao International Co., Ltd. ("WLI") in regard to the Sears, Kmart, et al. bankruptcy cases filed on 10/15/18.

As set forth in the attached spreadsheet showing the claims of WLI based on pre-BK invoices, pursuant to § 503(b)(1) and (b)(9), as well as the *Final Order Authorizing Debtors To ... (II) Confirm Administrative Expense Priority For Repetition Orders Delivered To The Debtors Postpetition, And Satisfy Such Obligations In The Ordinary Course Of Business* [Dkt. 843], WLI has an administrative claim in the total amount of \$1,385,069.10 for goods delivered to the Debtors (1) within 20 days before the petition date and (2) after the petition date (the "Administrative Claim"). The attached spreadsheet is based on data obtained from the Debtors' vendor interface portal, such that the Debtors can verify the information. With that said, to the extent needed to verify the Administrative Claim, WLI can provide back-up documentation.

WLI would like to come to agreement with the Debtors regarding the allowance and payment of the Administrative Claim. In connection with coming to such an agreement, the Debtors would also like to discuss terms for orders going forward. Given the bankruptcy filing and indications in some pleadings that the estates may be administratively insolvent, WLI is not willing to continue offering 60+ day terms on orders going forward and is considering going to, and may immediately go to, 15 or 30 day terms or even COD terms in order to minimize its risk.

Please note that, while WLI appreciates and wants to preserve its relationship with the Debtors, given the risks, WLI is not in a position to wait for any material amount of time before coming to an agreement with the Debtors or, alternatively, seeking relief in the Court, regarding the foregoing.

Please advise as to a good time by the middle of next week to discuss the foregoing.

Best Regards,

Todd

**TODD M. ARNOLD**, Esq.

**LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.**

10250 Constellation Blvd. | Suite 1700 | Los Angeles, CA 90067

Phone 310 229 1234 | Direct 310 229 3349 | Fax 310 229 1244

[tma@lnbyb.com](mailto:tma@lnbyb.com) | [lnbyb.com](http://lnbyb.com)

The preceding E-mail message is subject to Levene, Neale, Bender, Yoo & Brill L.L.P.'s  
email policies which can be found at <http://www.lnbyb.com/disclaimers.htm>.

þ Please consider the environment before printing this email